

1 Hon. Jamal N. Whitehead
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 JOSHUA A. DIEMERT, an individual,)
11) Civil Action No. 2:22-cv-01640-JNW
12 Plaintiff,)
13)
14 v.) **JOINT MOTION FOR EXTENSION**
15) **OF PRETRIAL DATES**
16)
17 THE CITY OF SEATTLE, a municipal)
corporation,)
Defendant.)
)

19 1. The Parties jointly move the Court for an extension of time in which to complete
20 certain pretrial tasks set out in the Court's Order Setting Trial Date and Related Dates (ECF No.
21 49) and others set by Local Civil Rule 16.

22 2. Trial is set to begin January 13, 2025. *See* Order (ECF No. 49).

23 3. The pretrial conference is set for January 6, 2025. *See id.*

24 4. The deadline for Plaintiff to serve his pretrial statement on Defendant was
25 November 25, 2024. Plaintiff did not serve his pretrial statement until December 5, 2024. The
26 pretrial statement Plaintiff served was not in final form. It contains over 500 exhibits, including
27 one exhibit totaling 9,000 pages. Plaintiff has agreed to create a revised version of his pretrial

statement that complies with Rule 16 and reflects only those exhibits he reasonably intends to use at trial. Plaintiff has agreed to serve Defendant with same by December 17, 2024.

5. The case schedule deadline for Defendant to serve its response to Plaintiff's pretrial statement was December 10, 2024. To mitigate the prejudice to Defendant, the Parties have agreed that Defendant should have ten days to respond to Plaintiff's revised pretrial statement.

6. Consistent with their agreement, the Parties request that the deadline for Defendant to serve its response to Plaintiff's revised pretrial statement be extended to December 27, 2024, the deadline for the Parties to confer regarding the pretrial statement be extended to December 31, and the deadline for the Parties to file the Pretrial Statement with the Court be extended to January 6, 2024.

7. The Parties further request that the deadline for deposition designations be extended 7 days, so that any designations are due December 30, 2024.

8. The Court recently extended the deadline for motions in limine by 12 days, so that motions are due December 16, 2024. *See Order* (ECF No. 87). No extension of this deadline is requested.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 11th day of December, 2024.

1 PACIFIC LEGAL FOUNDATION
2 Attorneys for Plaintiff Joshua A. Diemert

3 s/ Laura M. D'Agostino
4 LAURA M. D'AGOSTINO
5 Virginia Bar No. 91556 *
6 3100 Clarendon Blvd., Suite 1000
7 Arlington, Virginia 22201
8 Telephone: (202) 888-6881
9 LDAgostino@pacificlegal.org

10 s/ Andrew R. Quinio
11 ANDREW R. QUINIO
12 California Bar # 288101 *
13 s/ Erin E. Wilcox
14 ERIN E. WILCOX

15 California Bar # 337427 *
16 555 Capitol Mall, Suite 1290
17 Sacramento, California 95814
18 Telephone: (916) 419-7111
AQuinio@pacificlegal.org
EWilcox@pacificlegal.org

19 s/ Wesley P. Hottot
20 WESLEY P. HOTTOT, WSBA # 47539
21 1425 Broadway, #429
22 Seattle, Washington 98122
23 Telephone: (425) 576-0484
24 WHottot@pacificlegal.org

25 * *Pro hac vice*

26 DAVIS WRIGHT TREMAINE LLP
27 Attorneys for Defendant City of Seattle

28 s/ Victoria M. Slade
[signature added per authority]
Sheehan Sullivan, WSBA #33189
Victoria M. Slade, WSBA #44597
Darrah N. Hinton, WSBA #53542
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Email: sulls@dwt.com
Email: vickyslade@dwt.com
Email: darrahhinton@dwt.com

ORDER

PURSUANT TO STIPULATION IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

HON. JAMAL WHITEHEAD
UNITED STATES DISTRICT JUDGE